

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	
IP Network America, LLC	)	<b>ITC-214-20130204-00048</b>
	)	
	)	
Application for authorization under Section	)	
214 of the Communications Act of 1934, as	)	
amended	)	
	)	

**PETITION TO ADOPT CONDITIONS TO  
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”) submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.<sup>1</sup> Through this Petition, DOJ advises the Commission that DOJ, the Department of Defense (“DOD”), and the Department of Homeland Security (“DHS”) (collectively the “USG Agencies”) have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of IP Network America, LLC (“IP Network”) to abide by the commitments and undertakings set forth in the January 12, 2016 Letter of Assurances (“LOA”) executed by IP Network, which is incorporated into this Petition by this reference. The above-referenced proceeding involves an application filed by IP Network for authority to provide global or limited global facilities-based services and/or global or limited global resale services.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of

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<sup>1</sup> 47 C.F.R. § 1.41.

other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions and communications with representatives of IP Network in connection with the above-referenced proceeding, DOJ has concluded that the additional commitments set forth in the LOA will help ensure that the Executive Branch agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those responsibilities. Accordingly, the USG Agencies advise the Commission that they have no objection to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by IP Network with the LOA.

Respectfully submitted,

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